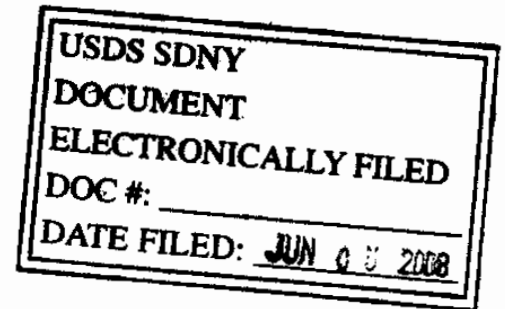


# RUTHERFORD & CHRISTIE, LLP

NEW YORK

ATLANTA

June 4, 2008



**VIA FACSIMILE (212) 805-6304**

Judge Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Carmen Acosta v. American Sales & Management Organization Corporation, et al.*  
United States District Court, Southern District of New York  
Docket No. : 07 CV 6326 (PAC) (FM)  
Our File : 3748.303

Dear Judge Crotty:

We represent American Airlines, Inc. in the above referenced matter. By way of background, in this case, the plaintiff, who suffers from paraplegia, alleges that she was "dropped" during a transfer from her seat to a wheelchair while attempting to deplane an American Airlines aircraft. The parties in this case are seeking an adjournment of the discovery deadlines, as the defendants, due to unforeseen circumstances, will not be able to produce their clients by the deposition deadline of June 6, 2008. The parties have previously, on two occasions, requested an adjournment, which was granted. All parties consent to this third request of a sixty day extension, if same is amenable to this Honorable Court.

Previously, the plaintiff made a demand for a video that defendant American Airlines provides defendant American Sales & Management Organization Corporation (hereinafter referred to as "ASMORG") for training purposes on how to transport passengers. The parties were unable to proceed with the deposition of ASMORG until this tape could be exchanged. However, the defendants, due to security reasons were unable to exchange same, until it could be reviewed and the exchange could be approved. The tape has been obtained and is currently being reviewed by the defendants' counselors. Accordingly, the deposition of ASMORG should proceed expeditiously.

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MEMO ENDORSED

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The deposition of American Airlines may not be able to be scheduled until July due to the fact that the witness for American Airlines, a flight attendant, is undergoing surgery in early June and will be unavailable for the entire month. This witness is essential to the defense of American Airlines, as she has relevant knowledge and cannot be substituted by another flight attendant.

\* Accordingly, the parties respectfully request an adjournment of the deposition and discovery deadlines. The parties have, thus far, worked diligently to comply with this honorable Court's directives by completing the plaintiff's deposition. In addition, the depositions of the plaintiff's son and granddaughter are scheduled for June 5, 2008. As this Honorable Court can observe, the parties are working amicably and diligently to adhere to the discovery schedule. Nonetheless, we require more time and respectfully request a sixty day extension, to August 8, 2008, to complete the necessary depositions and an extension of the discovery deadline to September 8, 2008.

Thank you for your consideration of this request.

Respectfully submitted,

**RUTHERFORD & CHRISTIE, LLP**

*L. Diana Mulderig*  
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/ldm

cc. **VIA FACSIMILE (516)747-6439**  
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\* SO ORDERED. JUN 5 2008  
*Paul A. Crotty*  
HON. PAUL A. CROTTY  
UNITED STATES DISTRICT JUDGE